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Attorneys for Defendant, Pro Source Lending Group LLC,

d/b/a Fast Fund Group, d/b/a Fast Funds Group

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

James E. Shelton, individually and on behalf
of all others similarly situated,

Civil Action No.: 2:24-cv-04394-GAM

Plaintiff,

v.

Pro Source Lending Group LLC, d/b/a Fast
Fund Group, d/b/a Fast Funds Group,

Defendant.

DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT

Defendant, Pro Source Lending Group LLC, d/b/a Fast Fund Group, d/b/a Fast Funds
Group ("Defendant"), by and through its undersigned counsel, hereby moves this Honorable
Court to dismiss the Complaint filed by Plaintiff, James E. Shelton ("Plaintiff"), pursuant to
Federal Rule of Civil Procedure 12(b)(6).

PLEASE TAKE FURTHER NOTICE that Defendant shall rely upon the
Memorandum of Law filed in support of this Motion as well as the Declaration of Thomas
Cialino.

A proposed form of Order is also being submitted.

Respectfully submitted,

Dated: November 6, 2024

/s/Thomas P. Cialino
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